

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO. 13-</b>
	:	
<b>v.</b>	:	<b>DATE FILED:</b>
	:	
<b>JUAN DIEGO RECINOS-MELGAR,</b>	:	<b>VIOLATIONS:</b>
<b>a/k/a “Juandiego Recinos Melgar,”</b>	:	<b>21 U.S.C. § 846 (conspiracy to distribute 1</b>
<b>a/k/a “Juandiego Recinos,”</b>	:	<b>kilogram or more of heroin – 1 count)</b>
<b>a/k/a “Juandiego Recinos-Melgar”</b>	:	<b>21 U.S.C. § 841(a)(1), (b)(1)(A) (possession of 1</b>
	:	<b>kilogram or more of heroin with intent to</b>
	:	<b>distribute – 1 count)</b>
	:	<b>Notice of forfeiture</b>

**INFORMATION**

**COUNT ONE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

1. From at least approximately January 2011 through approximately October 5, 2012, in Philadelphia, in the Eastern District of Pennsylvania, New York, New York, Atlanta, Georgia, and elsewhere, defendant

**JUAN DIEGO RECINOS-MELGAR,  
a/k/a “Juandiego Recinos Melgar,”  
a/k/a “Juandiego Recinos,”  
a/k/a “Juandiego Recinos-Melgar,”**

conspired and agreed with others known and unknown to the United States Attorney, to knowingly and intentionally distribute 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

**MANNER AND MEANS**

It was part of the conspiracy that:

2. Defendant JUAN DIEGO RECNOS-MELGAR was a member of a DRUG SMUGGLING ORGANIZATION (DSO), which smuggled heroin from Guatemala to the United States for distribution in Philadelphia and elsewhere.

3. Defendant JUAN DIEGO RECNOS-MELGAR was recruited by Person #1, who is known to the United States Attorney, in Guatemala to act as a courier on behalf of the DSO. Defendant RECNOS-MELGAR agreed to act as a courier and subsequently agreed to smuggle packets of heroin into the United States inside his body, either by swallowing the packets or by inserting the packets into a body cavity.

4. The DSO paid for the travel, lodging, food and other expenses for defendant JUAN DIEGO RECNOS-MELGAR.

5. When defendant JUAN DIEGO RECNOS-MELGAR entered the United States with the packets of heroin, he took a flight to New York or Philadelphia and elsewhere and expelled the heroin in a motel room. He then received drug proceeds and transported the proceeds back to Guatemala on behalf of the DSO.

### **OVERT ACTS**

In furtherance of the conspiracy, and to accomplish its objects, defendant JUAN DIEGO RECNOS-MELGAR committed the following overt acts, among others, in the Eastern District of Pennsylvania, and elsewhere:

1. Between approximately on or about January 18, 2012 and approximately on or about January 23, 2012, defendant JUAN DIEGO RECNOS-MELGAR travelled to Philadelphia and distributed heroin to members of the DSO and received drug proceeds in return.

2. Between approximately on or about March 3, 2012 and approximately on or

about March 7, 2012, defendant JUAN DIEGO RECINOS-MELGAR travelled to Philadelphia and distributed heroin to members of the DSO and received drug proceeds in return.

3. Between approximately on or about March 17, 2012 and approximately on or about March 20, 2012, defendant JUAN DIEGO RECINOS-MELGAR travelled to Philadelphia and distributed heroin to members of the CDSO and received drug proceeds in return.

4. Between approximately on or about June 24, 2012 and on or about June 28, 2012, defendant JUAN DIEGO RECINOS-MELGAR travelled to Philadelphia and distributed heroin to members of the DSO and received drug proceeds in return.

5. On or about July 6, 2012, defendant JUAN DIEGO RECINOS-MELGAR possessed approximately \$14,164 in drug proceeds at Atlanta Hartsfield-Jackson International Airport.

6. Between approximately on or about August 31, 2012 and approximately on or about September 3, 2012, defendant JUAN DIEGO RECINOS-MELGAR travelled to Philadelphia and distributed heroin to members of the DSO and received drug proceeds in return.

7. On or about July 6, 2012, defendant JUAN DIEGO RECINOS-MELGAR possessed approximately \$14,164 in drug proceeds at Atlanta Hartsfield-Jackson International Airport.

8. On or about n September 4, 2012, defendant JUAN DIEGO RECINOS-MELGAR possessed approximately \$13,582 in drug proceeds at Miami International Airport.

9. On or about October 5, 2012, at Atlanta Hartsfield-Jackson International Airport, defendant JUAN DIEGO RECINOS-MELGAR possessed 1 kilogram or more of heroin

with intent to distribute. The heroin was contained in 90 pellets that defendant RECINOS-MELGAR had swallowed in Guatemala on behalf of the DSO.

All in violation of Title 21, United States Code, Section 846.

**COUNT TWO**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

On or about October 5, 2012, in the Northern District of Georgia, defendant

**JUAN DIEGO RECINOS-MELGAR,  
a/k/a “Juandiego Recinos Melgar,”  
a/k/a “Juandiego Recinos,”  
a/k/a “Juandiego Recinos-Melgar,”**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, 1 kilogram or more, that is, approximately 1,024 grams, of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and Title 18, United States Code, Section 2.

**NOTICE OF FORFEITURE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. As a result of the offenses alleged in Counts One and Two of this Information, defendant

**JUAN DIEGO RECINOS-MELGAR,  
a/k/a “Juandiego Recinos Melgar,”  
a/k/a “Juandiego Recinos,”  
a/k/a “Juandiego Recinos-Melgar,”**

shall forfeit to the United States any and all property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as a result of such offenses; and/or any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, any such violations.

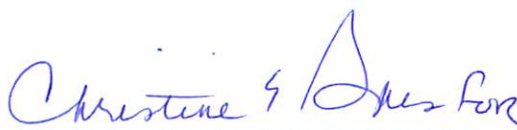
2. If any of the property described in paragraph 1, above, as a result of any act or omission of the defendant –

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to

seek forfeiture of any other property of the defendants up to the value of the property described in paragraph 1.

All in violation of Title 21, United States Code, Section 853.

  
**ZANE DAVID MEMEGER**  
**UNITED STATES ATTORNEY**